



Department of Energy

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MAR 28 2018

Mr. Jon Maybriar
Division of Waste Management
Kentucky Department for Environmental Protection
300 Sower Boulevard, 2nd Floor
Frankfort, Kentucky 40601

PPPO-02-4723331-18A

Dear Mr. Maybriar:

2017 SITE TREATMENT PLAN ANNUAL UPDATE AND WASTE MINIMIZATION ANNUAL PROGRESS REPORT FOR THE U.S. DEPARTMENT OF ENERGY, PADUCAH GASEOUS DIFFUSION PLANT, PADUCAH, KENTUCKY

References:

1. E-mail from L. Williamson to M. Redfield, "RE: PGDP Site Treatment Plan Reporting requirements," dated April 20, 2012 .
2. Letter from A. Webb to R. Knerr, "Approval of the Department of Energy's 2010 Site Treatment Annual Update Report and Request to Cease Quarterly Site Treatment Reporting Requirements.," dated July 28, 2011

Background

The September 10, 1997, Agreed Order (File No. DWM-30039-042) between the Kentucky Department for Environmental Protection (KDEP) and the U.S. Department of Energy (DOE) requires submittal of an annual update regarding implementation of the Site Treatment Plan (STP). Additionally, the Agreed Order requires that DOE implement a Waste Minimization and Pollution Prevention (WM/PP) Awareness Program to minimize the amount of new wastes added to the STP each year. The Agreed Order requires that a progress report be submitted annually on or before March 31 of each year for the previous calendar year (CY).

On July 9, 2009, discussions between Paducah DOE Site Office personnel and KDEP personnel resulted in agreement that both the quarterly progress report and the required annual STP update could be submitted in letter format. Subsequently, it was agreed that the WM Annual Progress Report could also be included in letter format with this submittal.

On July 28, 2011, KDEP approved the suspension of the quarterly and annual reporting requirements in the Agreed Order until any additional waste is added to the STP. In further discussions, KDEP requested an annual letter confirming no waste was added. This letter constitutes submittal of DOE's annual update for the reporting period of January 1, 2017, to December 31, 2017, confirming no addition of mixed low-level waste (MLLW) to the STP.

Four Rivers Nuclear Partnership, LLC (FRNP) is the contractor responsible for performing Resource Conservation and Recovery Act generator requirements on behalf of both FRNP and DOE for all activities in FRNP's contract. FRNP is responsible for ensuring overall compliance with the STP/Agreed Order.

Annual STP Update

Approved Amendments or Revisions: No amendments or revisions were approved by the Cabinet during CY 2017.

Volume of STP MLLW: Currently, no waste is being managed under the STP at the Paducah Gaseous Diffusion Plant (PGDP).

WM Annual Progress Report

The waste minimization goals related to the STP are as follows:

- Minimize the generation of hazardous and mixed waste;
- Segregate hazardous waste from radioactive mixed waste; and
- Reduce the volume, toxicity, and mobility of waste generated.

Implementation of these goals continues to ensure that the amount of waste that requires being added to the STP each year is minimized to the extent practicable.

Information regarding the PGDP WM/PP Program is provided in the current version of the FRNP *Paducah Deactivation Project Waste Management Plan*, CP2-WM-0001. All PGDP projects are evaluated for WM/PP opportunities. WM activities at the PGDP related to the STP WM goals include the following:


- Reducing the quantity of wastes generated at their sources;
- Treating wastewaters on-site to meet discharge limitations;
- Draining, decanting, drying, dewatering, evaporating, and otherwise removing liquid from wastes when possible;
- Segregating, sorting, consolidating, and reducing the volume of like wastes; and
- Reusing or recycling materials.

The following includes a brief discussion of the main STP WM accomplishments in 2017:

- Regenerated 22,240 pounds of activated carbon, averting disposal;
- Recycled 13,296 pounds of scrap metal;
- Recycled 982 pounds of various light bulbs; and
- Recycled 26,748 pounds of various batteries.

If you have any questions or require additional information, please contact Cynthia Zvonar at (859) 219-4066.

Sincerely,


Jennifer Woodard
Paducah Site Lead
Portsmouth/Paducah Project Office

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